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*Counsel for Defendant Blue Raven Solar, LLC*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

LOUIS NAIMAN, on behalf of himself and  
others similarly situated,

Plaintiff,

v.

BLUE RAVEN SOLAR, LLC,

Defendant.

No. 2:19-cv-1643-JAD-EJY

**JOINT MOTION TO EXTEND  
DEADLINES**

Plaintiff Louis Naiman and Defendant Blue Raven Solar, LLC respectfully move this Court for an extension of the upcoming deadlines set forth in the Case Scheduling Order entered on January 31, 2020 (Doc. 31). The parties request this extension of the case schedule to allow them additional time to complete discovery during the ongoing COVID-19 pandemic.

The parties have worked diligently to complete this phase of discovery according to the schedule previously entered by the Court despite the current circumstances. To date, the parties have agreed on search terms to apply to Blue Raven's document collected and Blue Raven recently completed their production of documents. The parties have also exchanged potential deposition dates for depositions that Plaintiff has noticed. The new proposed deadlines should provide sufficient time for the parties to negotiate a protocol for remote depositions of Blue Raven's witnesses, complete a supplemental collection and production of documents, and take all noticed depositions. The parties have tentatively agreed to schedule depositions for July and

1 August 2020 to accommodate the witnesses' availability, allow time to negotiate a remote  
 2 deposition protocol due to the limitations on travel applicable to the parties, witnesses, and their  
 3 attorneys, and allow for the completion of the supplemental document production (i.e., a  
 4 production of documents created after the initial collection of documents earlier this year).

5 The parties request that the following deadlines be extended as indicated below to ensure  
 6 sufficient time to complete this phase of discovery prior to briefing on a motion for summary  
 7 judgment:

8 <u>EVENT:</u>	9 <u>CURRENT DATE:</u>	10 <u>PROPOSED DATE:</u>
11 Deadline for discovery into vicarious liability issues	12 May 29, 2020	13 August 28, 2020
14 Amendment of Pleadings	15 June 12, 2020	16 September 11, 2020
17 Deadline for Blue Raven Solar's motion for summary judgment on vicarious liability	18 June 19, 2020	19 September 18, 2020
20 Deadline for Mr. Naiman's opposition to motion for summary judgment	21 July 10, 2020	22 October 9, 2020
23 Deadline for Blue Raven Solar's reply in support of motion for summary judgment	24 July 24, 2020	25 October 23, 2020

26 A proposed Order is attached.

1 Respectfully submitted,

2 /s/ Jonathan P. Misny

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/s/ James H. Moon, per auth. 5/29/20

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BLUE RAVEN SOLAR, LLC,

Defendant.

No. 2:19-cv-1643-JAD-EJY

**AMENDED CASE SCHEDULING ORDER**

Upon joint motion of the parties, and for good cause shown,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the following deadlines set forth in the Case Scheduling Order entered on January 31, 2020 (Doc. 31) are hereby extended as indicated below:

<u>EVENT:</u>	<u>PREVIOUS DEADLINE:</u>	<u>EXTENDED UP TO AND INCLUDING:</u>
Deadline for discovery into vicarious liability issues	May 29, 2020	August 28, 2020
Amendment of Pleadings	June 12, 2020	September 11, 2020
Deadline for Blue Raven Solar's motion for summary judgment on vicarious liability	June 19, 2020	September 18, 2020

<u>EVENT:</u>	<u>PREVIOUS DEADLINE:</u>	<u>EXTENDED UP TO AND INCLUDING:</u>
Deadline for Mr. Naiman's opposition to motion for summary judgment	July 10, 2020	October 9, 2020
Deadline for Blue Raven Solar's reply in support of motion for summary judgment	July 24, 2020	October 23, 2020

  
HON. ELAYNA J. YOUCHAH  
UNITED STATES MAGISTRATE JUDGE

Dated: May 29, 2020